

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on)	
behalf of all other similarly situated,)	
)	
Plaintiff,)	Case No. 1:22-cv-06918
)	
v.)	Hon. Franklin U. Valderrama
)	
BELKIN INTERNATIONAL, INC.,)	
)	
Defendant.)	

**DEFENDANT BELKIN INTERNATIONAL, INC.’S
OBJECTIONS AND RESPONSES TO PLAINTIFF’S REQUESTS FOR ADMISSION**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, defendant Belkin International, Inc., (“*Belkin*”), by and through its undersigned counsel, hereby answers Plaintiff’s Requests for Admission (the “Requests”).

GENERAL OBJECTIONS

Belkin makes the following preliminary statement and general objections to each of Plaintiff’s Requests (the “*General Objections*”):

1. Belkin objects to the Requests and their definitions and instructions to the extent that they purport to impose any obligation on Belkin in excess of the requirements set forth in any statute, rule, or order as may be applicable to this case and Belkin, including but not limited to the Federal Rules of Civil Procedure. Belkin’s responses to these Requests shall not be construed in any way as an admission that any definitions propounded by Plaintiffs bind Belkin either factually or legally.
2. In responding to the Requests, Belkin does not concede the relevancy, competency, materiality, propriety, or admissibility of any of the information sought therein.

Belkin's responses to the Requests are made specifically subject to, and without waiver of, Belkin's reservation of rights to object on any grounds to the use at any hearings or at trial any information furnished in response to these Requests, including but not limited to Belkin's objections as to privilege, relevancy, competency, materiality, propriety, and admissibility of Belkin's information and/or documents. Specifically, any admissions by Belkin herein shall not constitute an acknowledgement regarding the documents' authenticity or admissibility.

3. All of the objections and responses contained herein are based only upon information and documents presently available and specifically known to Belkin.

4. Belkin incorporates each of the foregoing General Objections into each of its specific responses to the Requests set forth below as if fully set forth therein. Responses to the Requests are not intended as and shall not be deemed a waiver of any applicable specific objection or General Objection to a particular Request for Production.

SPECIFIC OBJECTIONS AND RESPONSES

1. Admit that Belkin produced the documents attached as Exhibit A in discovery in this case: *Miley v. Belkin International, Inc.*, No. 20stcv00033, in the Superior Court of California (L.A. County).

RESPONSE: Belkin incorporates by reference the General Objections set forth above. In addition, Belkin objects to this Request on the grounds that it is overbroad and unduly burdensome to require Belkin to review Exhibit A page-by-page and word-by-word to compare with the production in *Miley v. Belkin International, Inc.* (the "Miley Action") in order to confirm that they are identical. Subject to and without waiving the foregoing objections, Belkin responds as follows: Belkin admits that it served a production in the Miley Action consisting of documents that were bates labeled BELKIN_000001 through BELKIN_001109, which appears

to be the documents contained in Exhibit A. However, Belkin reserves the right to raise challenges to these documents at a later time if it subsequently discovers that any portion of the production was omitted or altered.

2. Admit that Belkin served the written discovery responses attached as Exhibit B in discovery in *Miley v. Belkin*.

RESPONSE: Belkin incorporates by reference the General Objections set forth above. In addition, Belkin objects to this Request on the grounds that it is overbroad and unduly burdensome to require Belkin to review Exhibit B page-by-page and word-by-word to compare with the various written discovery responses served in *Miley v. Belkin International, Inc.* (the “Miley Action”) to confirm that they are identical. Subject to and without waiving the foregoing objections, Belkin responds as follows: Belkin admits that it served discovery responses in the Miley Action with the titles of the documents contained at Exhibit B. However, Belkin reserves the right to raise challenges to these documents at a later time, if it subsequently discovers that any portion of its discovery responses were omitted or altered.

3. Admit that Belkin filed the documents attached as Exhibit C on the docket in *Miley v. Belkin*.

RESPONSE: Belkin incorporates by reference the General Objections set forth above. In addition, Belkin objects to this Request on the grounds that it is overbroad and unduly burdensome to require Belkin to review Exhibit C page-by-page and word-by-word to compare with the docket in *Miley v. Belkin International, Inc.* (the “Miley Action”) to confirm that they are identical. Belkin further objects to this Request because it vague and ambiguous as to the phrase “filed the documents attached as Exhibit C on the docket.” Moreover, Belkin objects to this Request because Plaintiff should seek judicial notice of these documents if he wishes to use them in this action, as they are part of another court’s records. Subject to and without waiving the

foregoing objections, Belkin responds as follows: Deny.

4. Admit that Belkin wrote and sent the letter attached as Exhibit D.

RESPONSE: Belkin incorporates by reference the General Objections set forth above.

Subject to and without waiving the foregoing objections, Belkin responds as follows: Belkin admits that Exhibit D is a letter from Anilisa Lunger, who was Deputy General Counsel of Belkin International, Inc.

Dated: June 5, 2023

Respectfully submitted,

By: /s/ Patricia Mathy

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